

## Forres Sandle Manor (Non-Academic) Policy

Policy Title	<b>CCTV Policy</b>
Policy Lead (Appointment (& Initials))	<b>Bursar (CIJ)</b>
Date of Last Review	<b>Sept 2019</b>
Date of Next Review	<b>May 2021</b>

### CCTV POLICY

- The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at FSM. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to FSM and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the **System**).
- The System is administered and managed by the Bursar at FSM, who acts as the Data Controller. This policy will be subject to review from time to time, and should be read with reference to the School's Data Protection Policy.
- All fixed cameras are in plain sight on the FSM site. The school does not routinely use CCTV for covert monitoring or monitoring of private property outside the FSM grounds. In addition, the system has a number of dummy cameras deployed.
- FSM's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, FSM believes these purposes are all in its legitimate interests. Data captured will not be used for any commercial purpose.

### **OBJECTIVES OF THE SYSTEM**

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect the FSM buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of FSM site and deliveries and arrivals
- To monitor staff and contractors when carrying out work duties.

## **POSITIONING**

- Locations have been selected, both inside and out, that FSM reasonably believes require monitoring to address the stated objectives.
- Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- No images of public spaces will be captured except to a limited extent at one of the site entrances.

## **MAINTENANCE**

- The CCTV System will be operational 24 hours a day, every day of the year.
- The System Manager will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- The System will be checked and serviced no less than annually.

## **SUPERVISION OF THE SYSTEM**

- Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

## **STORAGE OF DATA**

- The day-to-day management of images will be the responsibility of the Bursar who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- Images will be stored for 2 weeks, and automatically over-written unless FSM considers it reasonably necessary for the pursuit of the objectives outlined earlier, or if lawfully required by an appropriate third party such as the police or local authority.
- Where such data is retained, it will be retained in accordance with the Act and FSM's Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in a System log book.

## **ACCESS TO IMAGES**

- Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the stated objectives (or if there is some other overriding and lawful reason to grant such access).
- Individuals also have the right to access personal data FSM holds on them, including information held on the System, if it has been kept. FSM will require specific details including at least time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.
- The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:
  - Where required to do so by the Head, the Police or some relevant statutory authority
  - To make a report regarding suspected criminal behaviour
  - To enable the Designated Safeguarding Lead (DSL) or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern
  - To assist FSM in establishing facts in cases of unacceptable pupil behaviour,
  - in which case, the parents/guardian will be informed as part of FSM's management of a particular incident
  - To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out above in the second black bullet above
  - To FSM's insurance company where required in order to pursue a claim for damage done to insured property
  - In any other circumstances required under law or regulation.
- Where images are disclosed, a record will be made in the system log book including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).
- Where images are provided to 3rd parties under this paragraph, where practicable steps will be taken to obscure images of non-relevant individuals.

## **OTHER CCTV SYSTEMS**

- FSM does not own or manage 3rd party CCTV systems, but may be provided by 3rd parties with images of incidents where this is in line with the objectives of FSM's own CCTV policy.
- Some pupils travel on transport provided by 3<sup>rd</sup> party contractors and a number of these vehicles are equipped with CCTV systems. FSM may use these in establishing facts in

cases of unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of FSM's management of a particular incident.

## **COMPLAINTS AND QUERIES**

- Any complaints or queries in relation to FSM's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Bursar.

## CCTV FOOTAGE ACCESS REQUEST

The following information is required before FSM can provide copies of or access to CCTV footage from which a person believes they may be identified.

Note that the CCTV footage may contain the information of others that needs to be protected, and that FSM typically overwrites CCTV recordings after a period of 2 weeks.

Name and Address:  (proof of ID will be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature\* .....

Print Name .....

Date .....

**\*NB: GDPR sets the Age of Data Consent at 13 years.** If requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.